

CR 23-265 MJD/DLW

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,) INDICTMENT
)
Plaintiff,) 18 U.S.C. § 2
) 18 U.S.C. § 922(g)
v.) 18 U.S.C. § 924(a)(8)
) 18 U.S.C. § 924(c)(1)(A)(i)
1. LATRE LAMONT ANDERSON,) 18 U.S.C. § 924(d)(1)
) 21 U.S.C. § 841(a)(1)
2. KHIANNA ROSE CLARK-STRONG,) 21 U.S.C. § 841(b)(1)(A)
) 21 U.S.C. § 841(b)(1)(B)
3. JACQUEZ O'NEAL FONDERN,) 21 U.S.C. § 841(b)(1)(C)
) 21 U.S.C. § 846
4. ROZELL ANTONIO GRAINGER,) 21 U.S.C. § 853
) 28 U.S.C. § 2461(c)
5. ISSAC ONEAL MAIDEN,)
)
6. OLIVIA MAE ERIN MARTINEAU, and)
)
7. JEREMY JAMES NELSON-CABAN, JR.,)
)
Defendants.)

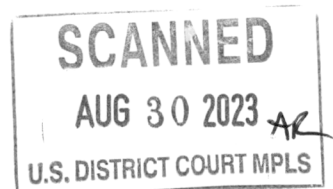
THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy To Distribute Fentanyl)

Beginning in or about the fall of 2022 and continuing through in or about August 30, 2023, in the State and District of Minnesota, and elsewhere, the defendants,

**LATRE LAMONT ANDERSON,
KHIANNA ROSE CLARK-STRONG,
JACQUEZ O'NEAL FONDERN,
ROZELL ANTONIO GRAINGER,
ISSAC ONEAL MAIDEN,
OLIVIA MAE ERIN MARTINEAU, and
JEREMY JAMES NELSON-CABAN, JR.,**



United States v. Latre Lamont Anderson, et al.

did unlawfully, knowingly and intentionally conspire with each other and with others, known and unknown to the grand jury, to distribute mixtures and substances containing detectable amounts of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called “fentanyl”), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Quantities of Controlled Substances Involved in Count 1

With respect to defendants **LATRE LAMONT ANDERSON, ROZELL ANTONIO GRAINGER** and **ISSAC ONEAL MAIDEN**, their conduct involved 400 grams or more of mixtures and substances containing detectable amounts of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called “fentanyl”), all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846.

With respect to defendants **KHIANNA ROSE CLARK-STRONG, JACQUEZ O’NEAL FONDERN, OLIVIA MAE ERIN MARTINEAU** and **JEREMY JAMES NELSON-CABAN, JR.**, their conduct involved mixtures and substances containing detectable amounts of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called “fentanyl”), all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 846.

COUNT 2

(Distribution of Fentanyl)

On or about November 8, 2022, in the State and District of Minnesota, the defendant,

JACQUEZ O’NEAL FONDERN,

United States v. Latre Lamont Anderson, et al.

did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called “fentanyl”), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 3

(Possession with the Intent To Distribute Fentanyl)

On or about November 8, 2022, in the State and District of Minnesota, the defendant,

JEREMY JAMES NELSON-CABAN, JR.,

did unlawfully, knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called “fentanyl”), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 4

(Possession with the Intent To Distribute Fentanyl)

On or about November 8, 2022, in the State and District of Minnesota, the defendant,

JEREMY JAMES NELSON-CABAN, JR.,

did unlawfully, knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called “fentanyl”), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

United States v. Latre Lamont Anderson, et al.

COUNT 5

(Distribution of Fentanyl)

On or about December 21, 2022, in the State and District of Minnesota, the defendant,

OLIVIA MAE ERIN MARTINEAU,

being aided and abetted by another, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called “fentanyl”), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 6

(Distribution of Fentanyl)

On or about February 3, 2023, in the State and District of Minnesota, the defendants,

**OLIVIA MAE ERIN MARTINEAU, and
KHIANNA ROSE CLARK-STRONG,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called “fentanyl”), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 7

(Possession with the Intent To Distribute Fentanyl)

On or about February 15, 2023, in the State and District of Minnesota, the defendant,

OLIVIA MAE ERIN MARTINEAU,

United States v. Latre Lamont Anderson, et al.

did unlawfully, knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called “fentanyl”), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 8

(Possession with the Intent To Distribute Fentanyl)

On or about March 14, 2023, in the State and District of Minnesota, and elsewhere, the defendants,

**ROZELL ANTONIO GRAINGER, and
ISSAC ONEAL MAIDEN,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called “fentanyl”), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 9

(Possession with the Intent To Distribute Fentanyl)

On or about March 14, 2023, in the State and District of Minnesota, and elsewhere, the defendants,

**ROZELL ANTONIO GRAINGER, and
ISSAC ONEAL MAIDEN,**

United States v. Latre Lamont Anderson, et al.

each aiding and abetting the other, did unlawfully, knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called “fentanyl”), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 10

(Possession with the Intent To Distribute Fentanyl)

On or about April 11, 2023, in the State and District of Minnesota, and elsewhere, the defendants,

**LATRE LAMONT ANDERSON,
ROZELL ANTONIO GRAINGER, and
ISSAC ONEAL MAIDEN,**

each aiding and abetting the others, did unlawfully, knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called “fentanyl”), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 11

(Possession with the Intent To Distribute Fentanyl)

On or about May 9, 2023, in the State and District of Minnesota, and elsewhere, the defendant,

LATRE LAMONT ANDERSON,

United States v. Latre Lamont Anderson, et al.

did unlawfully, knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propenamide (commonly called “fentanyl”), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 12

(Possession with the Intent To Distribute Fentanyl)

On or about July 30, 2023, in the State and District of Minnesota, the defendant,

LATRE LAMONT ANDERSON,

did unlawfully, knowingly and intentionally possess with the intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propenamide (commonly called “fentanyl”), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 13

(Carrying a Firearm During and in Relation to a Drug Trafficking Crime)

On or about July 30, 2023, in the State and District of Minnesota, the defendant,

LATRE LAMONT ANDERSON,

did knowingly and unlawfully carry a firearm, that is, a Glock, Model 23 Gen5, .40 caliber pistol, serial number BYSK329, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the crime set forth in Count

United States v. Latre Lamont Anderson, et al.

12 of this Indictment, which is hereby realleged and incorporated herein by reference, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 14

(Felon in Possession of a Firearm)

On or about July 30, 2023, in the State and District of Minnesota, the defendant,

LATRE LAMONT ANDERSON,

having previously been convicted of first-degree assault in Ramsey County, Minnesota, on or about February 22, 2018 (Case No. 62-CR-17-8001), and knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly and unlawfully possessed, in and affecting interstate and foreign commerce, a firearm, that is, a Glock, Model 23 Gen5, .40 caliber pistol, serial number BYSK329, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 15

(Possession with the Intent To Distribute Fentanyl)

On or about August 2, 2023, in the State and District of Minnesota, and elsewhere, the defendant,

LATRE LAMONT ANDERSON,

did unlawfully, knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly called “fentanyl”), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

United States v. Latre Lamont Anderson, et al.

FORFEITURE ALLEGATION

If convicted of any of Counts 1 through 12 and 15 of this Indictment, the defendants,

**LATRE LAMONT ANDERSON,
KHIANNA ROSE CLARK-STRONG,
JACQUEZ O'NEAL FONDERN,
ROZELL ANTONIO GRAINGER,
ISSAC ONEAL MAIDEN,
OLIVIA MAE ERIN MARTINEAU, and
JEREMY JAMES NELSON-CABAN, JR.,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of each such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of each such violation including, but not limited to, a Glock, Model 23 Gen5, .40 caliber pistol, serial number BYSK329, and all associated ammunition and firearm accessories. If any of the above-described property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property under Title 21, United States Code, Section 853(p).

If convicted of either of Counts 13 or 14 of this Indictment, the defendant,

LATRE LAMONT ANDERSON,

shall forfeit to the United States any firearms and ammunition involved in or used in connection with each such violation including, but not limited to, a Glock, Model 23 Gen5, .40 caliber pistol, serial number BYSK329, and all associated ammunition and firearm

United States v. Latre Lamont Anderson, et al.

accessories, all pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON